

GOULSTON & STORRS, P.C.

400 Atlantic Avenue

Boston, MA 02110

(617) 482-1776

Douglas B. Rosner (DR-5690)

Gregory O. Kaden(GK-9610)

Counsel to Interactive Data Corporation

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
LEHMAN BROTHERS HOLDINGS, INC.,	:	Case No. 08-13555 (JMP)
Debtors	:	(Jointly Administered)
	-x-	

**SUPPLEMENTAL CURE OBJECTION OF INTERACTIVE DATA
CORPORATION TO DEBTORS' MOTION TO (A) SCHEDULE A SALE
HEARING; (B) ESTABLISH SALES PROCEDURES; (C) APPROVE A BREAK-
UP FEE; AND (D) APPROVE THE SALE OF THE PURCHASED ASSETS AND
THE ASSUMPTION AND ASSIGNMENT OF CONTRACTS
RELATING TO THE PURCHASED ASSETS**

Interactive Data Corporation (together with its affiliates, “Interactive”) hereby respectfully submits this Supplemental Cure Objection to Lehman Brothers Holdings., Inc. (“LBHI”) and LB 745 LLC’s (collectively, the “Debtors”) Motion to (A) Schedule a Sale Hearing; (B) Establish Sales Procedures; (C) Approve a Break-Up Fee; and (D) Approve the Sale of the Purchased Assets and the Assumption and Assignment of Contracts Relating to the Purchased Assets (“Sale Motion”). Specifically, Interactive objects to the proposed cure amounts necessary to assume and assign Interactive’s contracts with the Debtors and their affiliates. This filing supplements Interactive’s Protective Response filed on September 19, 2008 (Docket No. 169) (the “Initial Protective Response”) and is being filed in accordance with this Court’s order approving the Sale Motion and directing contract parties to file cure objections on or before October

3, 2008. In support of this Supplemental Cure Objection, Interactive respectfully states as follows:

1. Interactive and LBHI are parties to that certain Amended and Restated Services Agreement dated as of March 7, 2008 (the “Global Services Agreement”). The Global Services Agreement states that Interactive will provide data delivery and other related services to LBHI pursuant to specific schedules executed from time to time between the parties or their respective affiliates (the “Schedules”). The Schedules provide pricing information and other terms on a project-by-project basis, but are expressly subject to the terms and conditions of the Global Services Agreement. Global Services Agreement, § 11. In this regard, the Schedules are inseparable from the overarching Global Services Agreement.

2. Attached as Exhibit A hereto is a list of the Interactive agreements (including Schedules) with the Debtors and their affiliates that Interactive has identified (collectively, the “Interactive Contracts”). Interactive has compared this list against the schedule of contracts that the Debtors assumed and assigned as part of the sale to Barclays Capital. However, Interactive has been unable determine which of the Interactive Contracts the Debtors in fact assigned. In particular, it is unclear whether the Debtors purported to assume and assign the Schedules but not the interrelated Global Services Agreement

3. The Debtors have proposed an aggregate cure of \$596,792.06 for all of the Interactive agreements they assumed and assigned as of the closing of the sale. As noted above, however, Interactive cannot determine whether the Debtors assumed and assigned all, or only a portion, of the Interactive Contracts. As a result, Interactive is unable to determine whether the Debtors’ proposed cure amount is correct. Based on

information available to Interactive, as of September 19, 2008, the total cure amount required under all of the Interactive Contracts is at least \$759,976 as set forth on Exhibit B hereto.

4. Interactive reserves the right to amend and further supplement this Supplemental Cure Objection, including but not limited to supplement the list of Interactive Contracts on Exhibit A hereto and to revise the cure amounts set forth on Exhibit B hereto. This supplement incorporates in its entirety the Initial Protective Response.

WHEREFORE, Interactive respectfully requests that this Court: (i) establish that the amount necessary to cure monetary defaults under the Interactive Contracts as required under section 365(b) of the Code is at least \$ 759,976, subject to confirmation of which of the Interactive Contracts the Debtors assumed and assigned, and (ii) grant Interactive such other and further relief as may be appropriate under the circumstances.

Dated: October 3, 2008

/s/ Gregory O. Kaden
Douglas B. Rosner, Esq. (DR-5690)*
Gregory O. Kaden, Esq. (GK-9610)*
GOULSTON & STORRS, P.C.
400 Atlantic Avenue
Boston, MA 02110-3333
Tel: (617) 482-1776
Fax: (617) 574-4112

Counsel to Interactive Data Corporation

*Admitted Pro Hac Vice.

EXHIBIT A

EXHIBIT A

<i>Agreement/Schedule</i>	<i>Effective/Commencement Date</i>	<i>IDCO Entity</i>	<i>Lehman Entity</i>
Amended and Restated Services Agreement	March 7, 2008	Interactive Data Pricing and Reference Data, Inc. (formerly FT Interactive Data Corporation)	Lehman Brothers Holdings, Inc.
Global Schedule, as amended	April 1, 2006	FT Interactive Data Corporation	Lehman Brothers Holdings, Inc.
Schedule of Data and Data Delivery Services Lehman Brothers Muni Bond Index	July 1, 2005	FT Interactive Data Corporation	Lehman Brothers, Inc.
TSIS/Muller Data Service Agreement (for Bloomberg view access)	July 1, 1996	FT Interactive Data Corporation	Lehman Brothers, Inc.
Schedule of Data Services, Lehman Brothers Euro and Asia Indices	April 15, 2003	FT Interactive Data Corporation	Lehman Brothers, Inc.
Schedule of Data Services Lehman Brothers Index Data Redistribution	April 15, 2003	FT Interactive Data Corporation	Lehman Brothers, Inc.
Letter Agreement	February 1, 2000	FT Interactive Data Corporation	Lehman Brothers, Inc.
Schedule of Data Services	February 20, 2008	Interactive Data Pricing and Reference Data, Inc.	Lehman Brothers Holdings, Inc.
Schedule of Data Services	February 20, 2008	Interactive Data Pricing and Reference Data, Inc.	Lehman Brothers Holdings, Inc.
Schedule of Data Services Accessed via Bloomberg	April 1, 2005	FT Interactive Data Corporation	Lehman Brothers Holdings, Inc.
Schedule of Data Services Accessed via Bloomberg	September 1, 2005	FT Interactive Data Corporation	Lehman Brothers Holdings, Inc.

EXHIBIT A

T-1 Addendum to Services Agreement	December 1, 2004	FT Interactive Data Corporation	Lehman Brothers Holdings, Inc.
Schedule of Data Services	March 1, 2001	Interactive Data Corporation	Lehman Brothers, Inc.
Schedule of Data Services	October 1, 2003	FT Interactive Data Corporation	Lehman Brothers, Inc.
Schedule of Data Services	March 1, 2002	FT Interactive Data Corporation	Neuberger Berman LLC (an affiliate of Neuberger Berman Inc.)
Schedule of Data Services (ETN)	February 20, 2008	Interactive Data Pricing and Reference Data, Inc.	Lehman Brothers Holdings, Inc.
Schedule of Data Services (ETN Market Index)	February 20, 2008	Interactive Data Pricing and Reference Data, Inc.	Lehman Brothers Holdings, Inc.
Data Services Agreement	August 16, 2007	Interactive Data Real-Time Services, Inc.	Lehman Brothers Holdings, Inc.
Service Schedule Number 1 Plus Feed	August 16, 2007	Interactive Data Real-Time Services, Inc.	Lehman Brothers Holdings, Inc.
Order Schedule Number UK02 To Global Services Agreement	November 12, 2007	Interactive Data Pricing and Reference Data, Inc.	Lehman Brothers Asset Management Ltd.
Order Schedule Number UK03 To Global Services Agreement	August 18, 2008	Interactive Data (Europe) Limited	Lehman Brothers Asset Management Ltd.
Data Distribution Agreement (Schedules A and B)	July, 2004	CMS BondEdge, a division of Interactive Data Corporation	Lehman Brothers, Inc.
Service Agreement	September 1, 2003	FT Interactive Data Corporation	Townsend Analytics, Ltd.
Schedule of Data and Data Delivery Services (RealTick and	February 1, 2004	FT Interactive Data Corporation	Townsend Analytics, Ltd.

EXHIBIT A

WebTick)	September 1, 2003	FT Interactive Data Corporation	Townsend Analytics, Ltd.
Schedule of Data Services (RealTick)			
Comstock Master License Agreement	July 14, 2006	Comstock, Inc.	Townsend Analytics, Ltd.
Order Schedule #1 for PlusFeed	July 14, 2006	Comstock, Inc.	Townsend Analytics, Ltd.
Master Services Agreement For the Provision of Primeporta Solution	October 1, 2007	Interactive Data Managed Solutions Ltd.	Lehman Brothers Limited
Order Schedule #1 “Swiss Website”	October 1, 2007	Interactive Data Managed Solutions Ltd.	Lehman Brothers Limited
Service Agreement	September, 2008	Interactive Data Corporation acting by and through its eSignal division	Lehman Brothers Securities Private Limited
Schedule of Data eSignal a division of Interactive Data Corporation	September, 2008	Interactive Data Corporation acting by and through its eSignal division	Lehman Brothers Securities Private Limited

EXHIBIT B

Account	Customer Name	Total Balance	
2CSM	IMAGE PROCESSING SYSTEMS	146	
2D3V	IMAGE PROCESSING SYSTEMS	48,445	
2DBO	IMAGE PROCESSING SYSTEMS	490,008	
2DCV	IMAGE PROCESSING SYSTEMS	2,140	
2M6R	IMAGE PROCESSING SYSTEMS	311	
799G	IMAGE PROCESSING SYSTEMS	12,560	
79R5	IMAGE PROCESSING SYSTEMS	429	
79WL	IMAGE PROCESSING SYSTEMS	1,076	
7A2A	IMAGE PROCESSING SYSTEMS	986	
7A37	IMAGE PROCESSING SYSTEMS	83	
8DKC	IMAGE PROCESSING SYSTEMS	11,506	
M02J	IMAGE PROCESSING SYSTEMS	6,551	
CEG5	IMAGE PROCESSING SYSTEMS	29,064	
TOTAL IMAGE PROCESSING SYSTEMS		603,306	
CEL6	LEHMAN BROTHERS	417	
79J0	LEHMAN BROTHERS	7,350	
P007	LEHMAN BROTHERS	7,225	
P008	LEHMAN BROTHERS	1,806	
TOTAL LEHMAN BROTHERS PRD US		16,798	
CK70	TOWNSEND ANALYTICS, LTD.	63,450	
CD98	TOWNSEND ANALYTICS, LTD.	(3,392)	
CDQ6	TOWNSEND ANALYTICS, LTD.	3,048	
2D99	TOWNSEND ANALYTICS, LTD.	13,642	
23UG	TOWNSEND ANALYTICS, LTD.	7,280	
TOTAL TOWNSEND ANALYTICS, LTD.		84,029	
e-Signal	LEHMAN BROTHERS	6,000	
TOTAL LEHMAN BROTHERS e-Signal		6,000	
PRD UK	LEHMAN BROTHERS	4,483	*
IDMS UK	LEHMAN BROTHERS	45,360	*
TOTAL LEHMAN BROTHERS UK		49,843	
Total Interactive Data AR Lehman Brothers as of 9/19/2008		759,976	
* fx rate: \$1.89 to £1			

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400 Atlantic Avenue

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(617) 482-1776

James F. Wallack (JW-4078)

Douglas B. Rosner (DR-5690)

Gregory O. Kaden(GK-9610)

Counsel to Interactive Data Corporation

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS, INC.,	:	Case No. 08-13555 (JMP)
	:	
Debtors	:	
-----x		

CERTIFICATE OF SERVICE

I, Gregory O. Kaden, hereby certify that on this 3rd day of October, 2008, I caused to be served a copy of the *Supplemental Cure Objection of Interactive Data Corporation to Debtors' Motion to (A) Schedule a Sale Hearing; (B) Establish Sales Procedures; (C) Approve a Break-up Fee; and (D) Approve the Sale of the Purchased Assets and the Assumption and Assignment of Contracts Relating to the Purchased Assets* on the parties set forth on the attached Service List via electronic service.

/s/ Gregory O. Kaden

Gregory O. Kaden (GK-9610)

GOULSTON & STORRS, P.C.

400 Atlantic Avenue

Boston, MA 02110-3333

Tel: (617) 482-1776

Fax: (617) 574-4112

Service List

Harvey R. Miller, Esq. Weil, Gotshal & Manges, LLP 767 Fifth Avenue New York, NY 10153 Counsel to the Debtor	United States Trustee Office 33 Whitehall Street 21st Floor New York, NY 10004
Dennis F. Dunne, Esq. Luc A. Despins, Esq. Milbank, Tweed, Hadley & McCloy LLP 1 Chase Manhattan Plaza New York, NY 10005 <i>Proposed Counsel to the Official Committee of Unsecured Creditors</i>	Lisa M. Schweitzer, Esq. Cleary Gottlieb Steen & Hamilton LLP One Liberty Plaza New York, NY 1006 <i>Counsel to Barclays Capital, Inc.</i>